

## EXHIBIT G

**In the Matter of:**

Amazon eCommerce

*September 27, 2022*

*Jeff Blackburn*

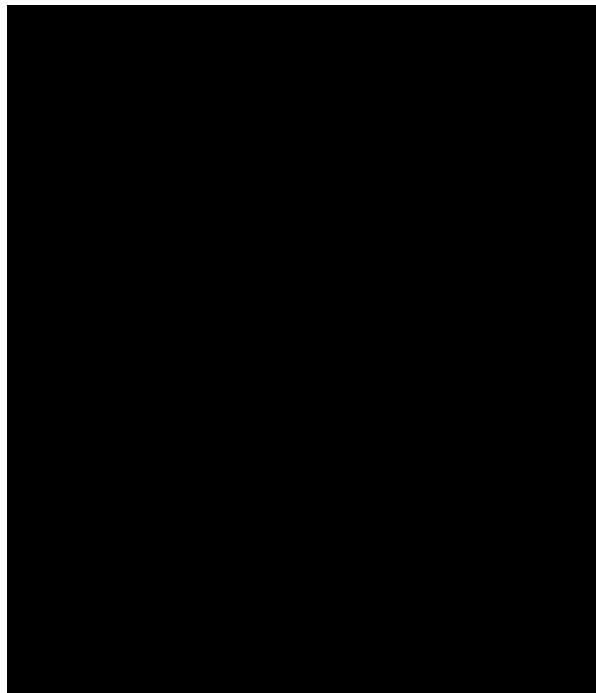
Condensed Transcript with Word Index



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Q You can put that document aside.

MS. BOLLES: I know this has been going an hour, but I do need a top off on

1 there?

2 A Jeff Bezos. His security team  
3 asked a few of us if we could start to  
4 communicate that way rather than text.

5 Q And you said a few of you, was  
6 that the S-Team?

7 A I can't remember if it was S-Team  
8 or his direct reports, but it was some senior  
9 group, yeah.

10 Q Do you recall who on Mr. Bezos'  
11 security team asked you to begin using Signal?

12 A No.

13 Q How big is his security team?

14 A The security team is a pretty big  
15 team. There's a group -- I'm talking in the  
16 past -- was responsible for his office and that  
17 group is maybe four or five people.

18 Q Do you still use Signal for work  
19 today?

20 A No.

21 Q Are you familiar with Signal's  
22 disappearing message feature?

23 A Yes.

24 Q Have you ever used Signal's  
25 disappearing message feature on messages about

202

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1 water, is everybody okay?

2 MS. WILKINSON: Sure.

3 (Brief recess.)

4 BY MS. BOLLES:

5 Q We've seen reference to "JBlack"  
6 all one word in the documents.

7 A Yes.

8 Q Is that you?

9 A Yes.

10 Q Mr. Blackburn, are you familiar  
11 with an app called Signal?

12 A Yes.

13 Q What is Signal?

14 A It's a messaging app that's kind  
15 of more secure than texting.

16 Q Have you ever used Signal for  
17 work?

18 A Yes.

19 Q When did you begin using Signal  
20 for work?

21 A I started -- it's the beginning of  
22 2019, around there. It was related to Jeff.  
23 He likes security and wanting us to have a more  
24 secure way to text.

25 Q And which Jeff are you referencing

1 work?

2 A No.

3 Q And just to be clear, when I say  
4 "use," I mean whether or not you turned on the  
5 disappearing message feature, if it was on,  
6 that's what I mean by "use"; is that fair?

7 A Yes, but I didn't use it a lot. I  
8 mean, I literally had a few different people  
9 that I would use it with. And then it's not  
10 like a primary way that I was communicating or  
11 anything like that in the company. And I  
12 wasn't, like, very familiar with those  
13 functions that you're discussing. I only later  
14 learned that, you know, these are -- about all  
15 that functionality.

16 MS. WILKINSON: You're talking  
17 about your use of Signal, generally.

18 THE WITNESS: Yes.

19 MS. WILKINSON: She was asking  
20 about just the function. But you're  
21 saying you didn't even use Signal.

22 THE WITNESS: I used it just for  
23 the messaging application. I later on  
24 learned that there's a lot more  
25 functionality to it and that was after I

	205		207
1	had come back to the company.	1	<b>Signal about work?</b>
2	BY MS. BOLLES:	2	A Jeff Bezos, Andy Jassy,
3	<b>Q So you learned about the</b>	3	Mike Hopkins, Jen Salke. Probably a few of my
4	<b>disappearing message feature after you came</b>	4	other direct reports. Maybe Steve Boom. Maybe
5	<b>back to the company?</b>	5	my finance leader. But it's a group of roughly
6	A Yes.	6	that size. I could probably count them on one
7	<b>Q Just to be clear, prior to leaving</b>	7	hand or two.
8	<b>the company, did you use the disappearing</b>	8	<b>Q Have you ever communicated about</b>
9	<b>message feature on Signal messages?</b>	9	<b>Prime Video on Signal?</b>
10	A I think it's default on.	10	A Probably.
11	<b>Q So might you have?</b>	11	<b>Q Have you ever had the disappearing</b>
12	A I didn't use it.	12	<b>message feature turned on when discussing</b>
13	<b>Q Might you have used the</b>	13	<b>Prime Video?</b>
14	<b>disappearing message feature?</b>	14	A No, not that I know of.
15	A I mean, I don't know.	15	<b>Q Have you communicated about</b>
16	<b>Q Did you receive any formal or</b>	16	<b>business strategy on Signal?</b>
17	<b>informal instructions on how to use Signal?</b>	17	A Perhaps. It's not something I
18	A I was told at a certain point by	18	would typically do. It's mainly meant for
19	our legal team to change.	19	short messages and our longer communications
20	MS. WILKINSON: You don't want to	20	are all, as you've seen in the documents
21	reveal privileged information. All you	21	obviously, you have e-mail in our documents and
22	can say is --	22	things like that. But I may have. I can't say
23	THE WITNESS: -- I was told by our	23	that I have definitively, but I haven't talked
24	legal.	24	about strategy on Signal. I might have.
25	MS. WILKINSON: -- to take certain	25	<b>Q Have you ever had the disappearing</b>
	206		208
1	actions.	1	<b>message feature turned on when discussing</b>
2	BY MS. BOLLES:	2	<b>business strategy on Signal?</b>
3	<b>Q Other than from your legal team or</b>	3	A I don't know. I'm not -- like I
4	<b>counsel, did you receive any formal or informal</b>	4	was saying, I'm not really familiar with that
5	<b>instructions on how to use Signal?</b>	5	or I wasn't when I was using Signal.
6	A No.	6	<b>Q Have you communicated about</b>
7	<b>Q Did you receive any instruction</b>	7	<b>potential or actual acquisitions on Signal?</b>
8	<b>from Mr. Bezos' security team as to how to use</b>	8	A I don't know.
9	<b>it?</b>	9	<b>Q What topics would you typically</b>
10	A No.	10	<b>communicate about on Signal?</b>
11	<b>Q To your knowledge, does Amazon</b>	11	A Typically, it would be things like
12	<b>have a policy about Signal usage by employees?</b>	12	can you do a call later today? Can you do this
13	A Well, the legal team put out --	13	meeting? What did you think of that? Should
14	that's the only thing.	14	we have another conversation? Do we need a
15	<b>Q So that's the only policy that</b>	15	further review of X or Y. You know, that's
16	<b>applied to Signal was from your legal counsel?</b>	16	what I remember using it for.
17	A I don't know if it's a policy	17	<b>Q Why did you want to use an</b>
18	even. It was just guidance on Signal.	18	<b>encrypted messaging app to have those</b>
19	<b>Q Have you asked anyone else to use</b>	19	<b>communications?</b>
20	<b>Signal for work?</b>	20	A I didn't want to. I didn't want
21	A Maybe people just in -- maybe	21	to. I was fine using text and e-mail. It
22	certain people that work closely in a group	22	happened. And Jeff had this incident -- I
23	with Jeff, I might have, yes. But I don't	23	don't really know what happened actually, but I
24	remember specifically doing that.	24	suspect that it was because of a hack or
25	<b>Q Who have you communicated with on</b>	25	something that happened to him, we were asked

<p>209</p> <p>1 to use a more secure messaging system. I 2 understood, and I used it.</p> <p>3 <b>Q Did you ever manually delete</b> 4 <b>messages from Signal?</b></p> <p>5 A Not that I remember, no.</p> <p>6 <b>Q Other than the use of the</b> 7 <b>disappearing message feature or by manually</b> 8 <b>deleting Signal messages, have you retained all</b> 9 <b>of your messages on Signal?</b></p> <p>10 A Yes. I mean, I don't use it any 11 longer, as I said. I copied my phone. You've 12 got all the information. It's all there. So 13 you know everything.</p> <p>14 <b>Q I understand you no longer use it,</b> 15 <b>did you delete the app off your phone?</b></p> <p>16 A It's not on my current phone. I 17 have a new phone.</p> <p>18 <b>Q When did you upgrade your phone?</b></p> <p>19 A I don't know.</p> <p>20 <b>Q Is it the iPhone 14?</b></p> <p>21 A Yes.</p> <p>22 <b>Q So after that came out you</b> 23 <b>upgraded your phone?</b></p> <p>24 A I don't know.</p> <p>25 <b>Q I'm just trying to get a ballpark.</b></p>	<p>211</p> <p>1 They have it all. They did it multiple times.</p> <p>2 <b>Q Who did you give your phone to?</b></p> <p>3 A A lawyer.</p> <p>4 <b>Q Was it one of your lawyers here</b> 5 <b>today? Just the name of the lawyer, none of</b> 6 <b>the content of the communications.</b></p> <p>7 A I don't know who it was. My 8 assistant did it.</p> <p>9 <b>Q Do you recall the dates of the</b> 10 <b>Signal message collections?</b></p> <p>11 MS. WILKINSON: I'm going to 12 object. I don't think he even knows what 13 that means when you say "collections" 14 because it's something the lawyers do.</p> <p>15 MS. BOLLES: I think we were just 16 talking about when Signal messages were 17 collected off his phone. My question is 18 what dates was that.</p> <p>19 THE WITNESS: I don't know when 20 that was.</p> <p>21 BY MS. BOLLES:</p> <p>22 <b>Q Do you recall the years or year?</b></p> <p>23 A There's some things that lawyers 24 were handling so you'd have to ask them. They 25 would know.</p>
<p>210</p> <p>1 <b>Was it the last month, the last week?</b></p> <p>2 A It wasn't in the last month or 3 last week, no.</p> <p>4 <b>Q Last six months?</b></p> <p>5 A Sometime in the last 12 months, I 6 would say.</p> <p>7 <b>Q Do you need an account to use</b> 8 <b>Signal?</b></p> <p>9 A I don't know. I think so, yes.</p> <p>10 Yes, you have to have some way to have your 11 name, so there has to be some kind of account.</p> <p>12 <b>Q Do you know if you still have a</b> 13 <b>Signal account?</b></p> <p>14 A I don't know. I don't use it.</p> <p>15 <b>Q Amazon collected Signal messages</b> 16 <b>off your phone, right?</b></p> <p>17 A Yes.</p> <p>18 <b>Q Do you recall if that was during</b> 19 [REDACTED]</p> <p>20 A I don't recall. I know there were 21 multiple times that it was done and we provided 22 my phone both times for as long as you wanted, 23 and you got it. So I don't know -- I don't 24 know anything about how that works. All I know 25 is someone took my phone. They took all of it.</p>	<p>212</p> <p>1 <b>Q Do you know if Amazon also took a</b> 2 <b>forensic image of your phone?</b></p> <p>3 A I believe they did, yeah. I was 4 told that that's the way it works and I know 5 that it happened multiple times, but that's all 6 I know.</p> <p>7 <b>Q Do you know why it happened</b> 8 <b>multiple times?</b></p> <p>9 A No.</p> <p>10 <b>Q Did Amazon also forensically image</b> 11 <b>your company-issued laptop in connection with</b> 12 <b>this matter?</b></p> <p>13 A I think so. But I'm not sure.</p> <p>14 <b>Q Did you have to relinquish your</b> 15 <b>laptop at that time?</b></p> <p>16 A I did, but my assistant would have 17 just done it.</p> <p>18 <b>Q Who is your assistant?</b></p> <p>19 A Sharon Signorelli.</p> <p>20 <b>Q Do you know if Amazon collected</b> 21 <b>your personal e-mails from Outlook or e-mail</b> 22 <b>for this matter?</b></p> <p>23 A I don't know.</p> <p>24 <b>Q I'm going to hand you Plaintiff's</b> 25 <b>Exhibit 1585.</b></p>

<p>1 (Copy of text messages was marked 2 PX1585 for identification.) 3 BY MS. BOLLES: 4 Q Have you reviewed the document? 5 A Yeah. 6 Q Do you recognize this document? 7 A It looks like messages, text 8 messages between myself and Jen Salke. 9 Q Do you see at the bottom it says 10 "You set disappearing message time to one 11 week"? 12 A Yes. 13 Q Does that indicate that these are 14 Signal messages? 15 A I don't know. You would know. I 16 think so. I don't know what it looks like. I 17 don't remember what the UI looks like for 18 Signal. That doesn't look like Apple texting 19 to me. 20 Q And do you have a disappearing 21 message function on your text messages? 22 A No. But there's many different 23 messaging apps. I use the Wickr one now. 24 Q Other than Wickr and Signal and 25 text message, have you used any other messaging</p>	<p>1 model." 2 Do you see that? 3 A Yes. 4 Q What does that mean? 5 A It means that some of this -- in 6 our estimation of what -- some of this older 7 intellectual property like Creed or Rocky or 8 Bond was probably more valuable to us than kind 9 of our finance team was thinking. 10 Q And why is that? 11 A Because new ideas come along and 12 ways to create new projects that we -- that the 13 modelers don't think about. Like, for example, 14 here it looks like there's opportunity around a 15 game for James Bond. That would not be 16 something that you would capture in that model. 17 It's a new opportunity. That's my opportunity. 18 I'm just stating it here. It's kind of a 19 texting thing. 20 Q After that message was sent, 21 that's where it says "You set disappearing 22 message time to one week," right? 23 A I don't know what that is. 24 Q So you don't recall setting the 25 disappearing message time in May of 2021?</p>
<p>1 apps for work? 2 A No. 3 Q So it appears that you are 4 messaging with Jennifer Salke; is that right? 5 A That's what this looks like, yes. 6 Q And then at the top it says 7 "JBlack and Mike." 8 Do you see that? 9 A Yes. 10 Q Do you know who Mike is? 11 A That's probably Mike Hopkins. 12 Q There are two dates on the screen. 13 One is Monday, May 24, and one is July 13. 14 Can you confirm the year of these 15 messages? My understanding is that it is 2021, 16 but I would like to know if you agree with 17 that. 18 A Okay. Yeah, this is very shortly 19 after I came back to the company. 20 Q And was that in 2021? 21 A Yes. 22 Q At the bottom of the screen, you 23 write, "Thumbs up emoji. Jim Freeman, was 24 good, kind of what you've been saying all 25 along, old IP, more valuable to PV versus</p>	<p>1 214 2 A No. 3 Q Do you recall if you continued to 4 discuss with Miss Salke and Mr. Hopkins 5 Prime Video on Signal? 6 A I don't know that we did very 7 much. I don't remember doing it very much, no. 8 I mean, if we did, it was only in a very 9 limited way. 10 Q At the bottom of the screen it 11 says "Tuesday, July 13," but then it's cut off. 12 Do you recall if anything happened 13 on Tuesday, July 13, 2021, on Signal? 14 A No. 15 Q I'm going to hand you what's been 16 marked as PX1586. 17 (Copy of text messages was marked 18 PX1586 for identification.) 19 Q Have you had a chance to review 20 the document? 21 A Yeah. 22 Q This document at the top says 23 "MHJS." 24 Do you see that? 25 A Yes. Q Is that Mike Hopkins,</p>

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1       **Jennifer Salke?**  
 2       A    I think so.  
 3       **Q    Do you see the date at the top**  
 4       **says "Tuesday, July 13"?**  
 5       A    Yes.  
 6       **Q    My understanding is that the year**  
 7       **is 2021, but does that sound right based on the**  
 8       **context of this document?**  
 9       A    I don't know. I don't have this  
 10      information.  
 11      **Q    This says "On Tuesday, July 13,**  
 12      **you disabled disappearing messages."**  
 13      **Do you see that?**  
 14      A    Yes.  
 15      **Q    Do you recall disabling**  
 16      **disappearing messages on July 13?**  
 17      A    No, but I know that I did at some  
 18      point.  
 19      **Q    You did at some point disable**  
 20      **disappearing messages?**  
 21      A    Yes.  
 22      **Q    Was that after you learned about**  
 23      **the disappearing message functionality?**  
 24      A    Yes. Someone explained how it  
 25      worked.

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1       said. I didn't say that I didn't recall doing  
 2       it, I don't recall the date. I got guidance  
 3       from our legal department, and I made the  
 4       change. And I think that happened more than  
 5       one time, so -- and I did what they told me to  
 6       do.

7       **Q    By "more than one time," do you**  
 8       **mean like on multiple threads?**

9       A    No. No. There is at least one  
 10      time period. There may have been two. They  
 11      said, This has this functionality in it. You  
 12      need to turn it off.

13      MS. WILKINSON: Okay. You can't  
 14      say more. You can say you received  
 15      guidance on several occasions and after  
 16      that you turned it off.

17      Is that fair?

18      THE WITNESS: Yes. I think that's  
 19      what you're seeing here.  
 20      BY MS. BOLLES:

21      **Q    Did you receive a document**  
 22      **preservation notice in this matter?**

23      A    I don't know.

24      **Q    Do you know if you're currently**  
 25      **under a document preservation notice in this**

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1       **Q    And was that when you came back to**  
 2       **Amazon in 2021?**  
 3       A    I don't remember when it was  
 4       exactly, the timing of that.  
 5       **Q    Was it after you came back to**  
 6       **Amazon?**  
 7       A    So this is like --  
 8       MS. WILKINSON: I think --  
 9       THE WITNESS: My lawyers have  
 10      talked to me about this stuff.  
 11      MS. WILKINSON: Can we consult off  
 12      the record for a moment?  
 13      MS. BOLLES: Yes, and if you want  
 14      to step outside, that's fine.  
 15      MS. WILKINSON: Let's step  
 16      outside.  
 17      (Brief recess.)  
 18      BY MS. BOLLES:  
 19      **Q    I think we established before we**  
 20      **took a short break that you did not recall**  
 21      **disabling disappearing messages on July 13; is**  
 22      **that right?**  
 23      **I might have that wrong so please**  
 24      **correct me if I'm wrong.**  
 25      A    I don't recall the date is what I

1       **matter?**

2       A    Yes, I am.

3       **Q    When did that begin?**

4       A    I don't know.

5       **Q    How do you know that you're**  
 6       **under -- I want to be clear.**

7       A    I don't know what this matter is  
 8       for. There's multiple things going on here.  
 9       There's many, many different matters for which  
 10      I get document preservation notices, so I can't  
 11      tell you specifically. When you say "for this  
 12      matter," the best way to answer is I don't  
 13      know. Yes, am I aware that I get document  
 14      preservation notices, yes, I am.

15      **Q    Did you receive a document**  
 16      **preservation notice in connection with** [REDACTED]

17      A    Yes.

18      **Q    Did you receive a document**  
 19      **preservation notice in connection with any**  
 20      **other FTC investigations?**

21      A    I believe I have, yes.

22      **Q    Do you recall when that was?**

23      A    No.

24      **Q    I want to be clear that I'm not**

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1 asking for your advice of counsel, the  
 2 boundaries that we've drawn today.  
 3 What was your understanding of  
 4 whether Signal messages were covered by the  
 5 document preservation notices?

6 MS. WILKINSON: I'm going to  
 7 object because I think it's -- if I could  
 8 assist, give him a timeframe because  
 9 you're saying -- I think it's -- that  
 10 could affect the privilege issue. So if  
 11 you could make it a little more specific,  
 12 if you can, go ahead. He may or may not  
 13 be able to answer.

14 MS. BOLLES: That's fair.

15 BY MS. BOLLES:

16 Q At the time that you received the  
 17 document preservation notices, did you  
 18 understand whether Signal messages were covered  
 19 by them?

20 A I did not.

21 Q Did you ever learn that Signal  
 22 messages were or were not covered by the  
 23 document preservation notices?

24 A Again, that would be something I  
 25 discussed with lawyers.

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1 object here. When you say "this matter,"  
 2 there's multiple matters.

3 BY MS. BOLLES:

4 Q Do you understand the matter that  
 5 I'm referring to?

6 A No, I don't really know what  
 7 you're getting at.

8 Q Do you understand that in addition  
 9 to [REDACTED] there is another FTC  
 10 investigation?

11 A Yes.

12 Q Do you understand that you've been  
 13 subpoenaed here today to testify as part of an  
 14 FTC investigation?

15 A Yes.

16 Q Do you feel confident that you  
 17 understand the scope of your document  
 18 preservation obligations pursuant to this FTC  
 19 investigation?

20 A I think I understand them in a  
 21 general way. I don't know how specifically you  
 22 would want my understanding to be, the depth of  
 23 that.

24 MS. WILKINSON: And there's  
 25 multiple investigations. You're implying

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1 MS. BOLLES: A yes-or-no answer is  
 2 all I'm looking for.

3 MS. WILKINSON: He said that's  
 4 something I discussed with lawyers.

5 MS. BOLLES: So is that a yes?

6 MS. WILKINSON: You can say yes.

7 THE WITNESS: Yes.

8 MS. WILKINSON: Then you just have  
 9 to say yes.

10 THE WITNESS: Yes. What am I  
 11 supposed to say?

12 MS. WILKINSON: It's something  
 13 lawyers focus on and we sometimes think  
 14 people that aren't lawyers remember a lot  
 15 more of the details than they do. No  
 16 problem, you just tell her what you  
 17 remember and what you don't.

18 BY MS. BOLLES:

19 Q I'm just looking for a yes or no  
 20 on this. I'm not trying to get into the  
 21 contents.

22 Did you receive any additional  
 23 training in document retention in connection  
 24 with this matter?

25 MS. WILKINSON: I'm going to

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1 just two, sadly for Amazon, there's more  
 2 than that.

3 BY MS. BOLLES:

4 Q Did you receive additional  
 5 training on document retention in connection  
 6 with FTC investigations?

7 MS. WILKINSON: Again, I'm going  
 8 to object. Additional training? I don't  
 9 know that you established he received any  
 10 training. I believe he told you he  
 11 received legal guidance.

12 BY MS. BOLLES:

13 Q Did you receive training on  
 14 document retention in connection with FTC  
 15 investigations?

16 A I received legal guidance, e-mails  
 17 to me.

18 Q Did you ever receive a training?  
 19 A What do you mean by "a training"?

20 Q I'm just trying to establish --  
 21 you testified that you had e-mail guidance.

22 Was there anything else?

23 A No.

24 MS. WILKINSON: I'm going to

25 object. If you're going to start asking

<p>225</p> <p>1 about what the training is you're going 2 to get into -- 3 MS. BOLLES: I'm asking about 4 whether the training existed, that's all. 5 MS. WILKINSON: Again, he asked 6 you what it was. He told you he received 7 legal guidance and he said one of the 8 ways was through e-mail. 9 MS. BOLLES: Yes. What format was 10 the legal guidance given in? Was it only 11 via e-mail? 12 MS. WILKINSON: If you've got 13 multiple formats you can say multiple. 14 Did you speak to lawyers face-to-face as 15 well as receive e-mails. 16 THE WITNESS: E-mail and 17 conversation. 18 BY MS. BOLLES: 19 Q Who was the conversation with? 20 I'm not asking about the contents of the 21 conversation, just the name of the person it 22 was with. 23 MS. WILKINSON: You can say the 24 name if you can remember, if it was one 25 or more people.</p>	<p>227</p> <p>1 A No. And, again, I received legal 2 guidance that that was a secure messaging app, 3 and we're using it. 4 Q Have you ever asked anyone you 5 work with to use Wickr? 6 A I don't know. Maybe. 7 Q Who do you communicate with on 8 Wickr? 9 A Andy Jassy, Jeff Bezos. Some of 10 my direct reports. 11 Q How frequently do you use Wickr? 12 A A couple times a week. 13 Q Have you ever messaged about 14 Prime Video using Wickr? 15 A I don't think so. But I may have. 16 Q What about discussing business 17 strategy, have you discussed business strategy 18 on Wickr? 19 A It depends what you mean by 20 "business strategy." 21 Q I'm happy to defer to your 22 definition. 23 A Like I said, it's not kind of a 24 substantial, in-depth conversations, but every 25 now and then something does come up and there's</p>
<p>226</p> <p>1 THE WITNESS: I remember talking 2 to Kelly Jo McArthur. 3 BY MS. BOLLES: 4 Q And is that an Amazon attorney? 5 A Yes. 6 Q Do you recall when you spoke with 7 them? 8 A No. 9 Q I believe you mentioned Wickr in 10 your testimony earlier. 11 W What is Wickr? 12 A It's an Amazon messaging app. 13 Q Is it also encrypted? 14 A Yes. It's secure, similar to the 15 ways Signal was. 16 Q Does it have an auto delete 17 feature? 18 A I don't know. 19 Q Have you used Wickr for work? 20 A Yes, but only lightly and kind of 21 the same way, just a handful of people. I 22 don't use it for longer topics or business 23 decisions or things like that. 24 Q Do you recall the date you started 25 using Wickr?</p>	<p>228</p> <p>1 emergency issues or urgent issues or something 2 like that and it does relate to business, so it 3 does happen. It's not the primary method. 4 Q Do you still use Wickr for work 5 today? 6 A Yes. 7 Q Have you retained all of your 8 messages about work on Wickr? 9 MS. WILKINSON: I don't think he 10 has an obligation to retain all of his 11 messages on Wickr. You're asking about 12 everything he does. Even with all the 13 investigations going on, I don't think 14 everything he does is -- he's required 15 to, so if you could stick to what you 16 were, which is -- I'm not sure he could 17 answer it, that could be responsive to 18 the investigations and maybe he keeps 19 them, but I don't want the implication 20 that he has to retain every message. 21 MS. BOLLES: I'm not implying 22 anything. 23 MS. WILKINSON: I know you're not. 24 I want the record to be clear that that's 25 not what you're focusing on. I think</p>

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1	you're focusing on that he's required to	1	A Nope.
2	retain.	2	<b>Q What about Telegram?</b>
3	MS. BOLLES: Sure. And I'm happy	3	A No.
4	to parse that later with you, but for	4	<b>Q I believe you testified earlier</b>
5	now, Mr. Blackburn, have you retained all	5	<b>that you had used text messages for work; is</b>
6	of your messages about work on Wickr?	6	<b>that right?</b>
7	THE WITNESS: I believe that I	7	A Uh-huh.
8	have, yes.	8	<b>Q What was the purpose of using text</b>
9	BY MS. BOLLES:	9	<b>messages for work?</b>
10	<b>Q Have you ever used Slack for work?</b>	10	A Well, it just -- it's not that I
11	A The Twitch team uses Slack. We	11	want to, just that it -- it's kind of how when
12	had a security incident with Twitch and at that	12	you're working very closely with people, it's
13	time I needed to use it with them. But that's	13	just something that's done. I try very much to
14	the only time that I was using it.	14	not have it be my work thing. I don't want it
15	<b>Q And do you recall when that was?</b>	15	to be, but external people, our relationships
16	A The Twitch security problem was	16	with external people, they use it so then it
17	last fall some time, November or October a year	17	starts to blend that way.
18	ago.	18	<b>Q Do you recall having deleted</b>
19	<b>Q 2021?</b>	19	<b>work-related texts?</b>
20	A Yes.	20	A No.
21	<b>Q Do you still use Slack with the</b>	21	<b>Q When you transferred phones, did</b>
22	<b>Twitch team?</b>	22	<b>they pull over your text messages?</b>
23	A No.	23	A I think so, yeah.
24	<b>Q How frequently did the Twitch team</b>	24	<b>Q When you transferred phones, did</b>
25	<b>use Slack when it was in use?</b>	25	<b>anyone at Amazon assist you with the switch?</b>
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1	A Well, you know, it was an	1	A I think our IT department made
2	emergency-type event, so we were using it many	2	sure all of the apps that I was using were
3	times a day for a few weeks.	3	refreshed, yes.
4	<b>Q You said "a few weeks"?</b>	4	MS. BOLLES: I will take a short
5	A Yeah.	5	break and -- actually, let's go off the
6	<b>Q Do you know if you can share</b>	6	record.
7	<b>documents via Slack?</b>	7	(Brief recess.)
8	A I don't know. You can share a	8	MS. BOLLES: Mr. Blackburn, I have
9	link to a document, a Cloud document. So	9	no further questions for you today.
10	that's what they would do.	10	Thank you so much for your time.
11	<b>Q Do you still have -- or let me ask</b>	11	MS. WILKINSON: We can go off the
12	<b>this, did you use Slack on your computer or on</b>	12	record.
13	<b>your phone?</b>	13	The deposition was concluded at
14	A I used it on my phone.	14	5:37 p.m.
15	<b>Q Was there an app that you had to</b>	15	
16	<b>download to use it?</b>	16	
17	A Yes.	17	
18	<b>Q Do you still have that app on your</b>	18	
19	<b>phone?</b>	19	
20	A I might. I'm not sure. It	20	
21	depends when I got the new phone. But I	21	
22	think -- I might. I don't use it, so -- but it	22	
23	might be on there.	23	
24	<b>Q Have you ever used WhatsApp for</b>	24	
25	<b>work?</b>	25	